

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

SOPHIA PARKER STUDIOS, INC.
(t/a WIFE NYC),

Plaintiff,

v.

ALICE TEMPERLEY MBE, TMLL LTD. (t/a
TEMPERLEY LONDON), TEMPERLEY
HOLDINGS LTD. (t/a TEMPERLEY
HOLDINGS), ROMO LTD. (t/a ROMO and/or
THE ROMO GROUP), ROMO (HOLDINGS)
LTD., ROMO, INC. (t/a ROMO FABRICS
AND WALLCOVERINGS and ROMO USA),
THE ROMO GROUP LTD., AND DOES 1-20,
inclusive,

Defendants.

Case No. 1:24-cv-02086-PAB

Judge Pamela A. Barker

Magistrate Judge Reuben J. Shepherd

**PLAINTIFF SOPHIA PARKER
STUDIOS, INC.’S MOTION FOR
RECONSIDERATION OF THE
COURT’S MAY 9, 2025 ORDER
GRANTING DEFENDANTS’
“MOTION FOR SETTING OF
DEADLINE FOR RESPONSE TO
FIRST AMENDED COMPLAINT OR,
ALTERNATIVELY, FOR
EXTENSION OF TIME TO
RESPOND” AND REPLY TO
DEFENDANTS’ “OPPOSITION TO
PLAINTIFF SOPHIA PARKER
STUDIOS, INC.’S REQUESTS FOR
CLERK’S ENTRY OF DEFAULT”**

Plaintiff Sophia Parker Studios, Inc. (t/a WIFE NYC) (“**Plaintiff**”) respectfully requests that the Court reconsiders its May 9, 2025 Non-Document Order granting the U.K.-based Defendants’ “Motion for Setting of Deadline for Response to First Amended Complaint Or, Alternatively, for Extension of Time to Respond” and providing them until May 27, 2025 to file a response to the First Amended Complaint. Plaintiff requests that this Court directs the Clerk to enter Default against the U.K.-based Defendants, Defendants

Alice Temperley MBE (“**Temperley**”), TMLL Ltd. (“**TMLL**”), Temperley Holdings Ltd. (“**Temperley Holdings**”), Romo Ltd. (“**Romo Ltd.**”), Romo (Holdings) Ltd. (“**Romo Holdings**”), and The Romo Group Ltd. (“**Romo Group**”) for their failure to file an answer or otherwise defend within 21 days of being served with Plaintiff’s First Amended Complaint in compliance with Fed. R. Civ. P. 12(a)(1)(A) and 55(a). In support of the same, Plaintiff files the enclosed Memorandum of Law and Reply to Defendants’ “Opposition to Plaintiff Sophia Parker Studios, Inc.’s Requests for Clerk’s Entry of Default.”

Fed. R. Civ. P. 12(a)(1)(A) states: “A defendant must serve an answer; (i) within 21 days *after being served with the summons and complaint*” unless defendant has timely waived service under Rule 4(d).

Fed. R. Civ. P. 55(a) states: “When a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise, the clerk **must** enter the party’s default.” (emphasis added).

As evidenced by the Proof of Service forms and declarations of Plaintiff’s counsel, Alyssa M. Bruno, Esq. (“**Attorney Bruno**”), filed with the Court, service has been properly effectuated upon all of the U.K.-based Defendants pursuant to the Hague Convention on Service Abroad of Judicial and Extrajudicial Documents in Civil and Commercial Matters (“**Hague Convention**”). (See Return of Service Forms, *Docs.* #32, 33, 34, 35, 43) (See Bruno Declarations as Attachment #1 at *Docs.* #36, 37, 38, 39, 40, 44). The U.K.-based Defendants do not contest the sufficiency of the service upon them, and they do not claim that they lacked notice of being served in early April 2025. Rather, they merely contend that

they “had no reason to know” that service had been effectuated until May 4, 2025 when the Hague Certificate Attestations were filed as Proof of Service with the Court. This does not establish “good cause” as to why Defendants’ failed to file their answers or respond to the First Amended Complaint within the 21-day period set forth in Fed. R. Civ. P. 12(a)(1)(A). The U.K.-based Defendants’ conduct was culpable, and Default should have been entered.

Plaintiff therefore respectfully requests that the Court reverses its May 9, 2025 Non-Document Order granting the U.K.-based Defendants until May 27, 2025 to file an answer or response to Plaintiff’s First Amended Complaint and directs the Clerk to enter Default pursuant to Fed. R. Civ. P. 55(a) against Defendants Alice Temperley MBE, TMLL Ltd., Temperley Holdings Ltd., Romo Ltd., Romo (Holdings) Ltd., and The Romo Group Ltd. for their failure to file a response or otherwise defend within the 21-day period set forth in Fed. R. Civ. P. 12(a)(1)(A).

A proposed Order is attached.

Dated: May 12, 2025

By: /s/ Alyssa M. Bruno
Alyssa M. Bruno
(PA ID #321345; NJ ID #152382016)
[Admitted to this Court]
A. BRUNO LAW
P.O. Box 468
Easton, PA 18044
Telephone: (610) 258-4003
Email: abruno@abrunolaw.com

*Attorney for Plaintiff Sophia Parker
Studios, Inc. (t/a WIFE NYC)*